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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

LAWRENCE BRANCO,)	CASE NO. 1:23-cv-01623-NODJ-EPG
)	
Plaintiff,)	
)	JOINT STIPULATION TO CONTINUE
vs.)	INITIAL SCHEDULING CONFERENCE
)	AND TO EXTEND DEADLINE TO SUBMIT
)	INITIAL DISCLOSURES; ORDER
AETNA LIFE INSURANCE)	
COMPANY, and Does 1 through 50,)	(ECF No. 10)
inclusive,)	
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Defendants.)	
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TO THIS HONORABLE COURT:

Plaintiff Lawrence Branco (“Plaintiff”) and Defendant Aetna Life Insurance Company (“Defendant”) (Plaintiff and Defendant are collectively referred to herein as the “Parties”), by and through their respective counsel of record, hereby agree and stipulate to the following:

WHEREAS, Plaintiff initiated this action on October 10, 2023, in the Superior Court of the State of California, County of Fresno, case number 23CECG04239 [Dkt. No. 1-1, Exhibit A];

WHEREAS, on November 17, 2023, Defendant removed this action from the Fresno County Superior Court to this Court [Dkt. No. 1];

WHEREAS, Defendant filed its Answer to the Complaint on December 6, 2023 [Dkt. No. 7];

WHEREAS, the Initial Scheduling Conference is currently scheduled for February 20, 2024, at 11:00 a.m. [Dkt. No. 9];

WHEREAS, the Parties’ current deadline to submit their Initial Disclosures is February 8, 2024 [Dkt. No. 9];

WHEREAS, due to the information exchanged during the Parties’ meet and confer discussions, Plaintiff is considering whether to amend his Complaint. The Parties have exchanged documents and information, and in order to provide the Parties with sufficient time to meet and confer and review all the relevant documents, Plaintiff and Defendant have agreed that it would be prudent to continue to the Initial Scheduling Conference and to extend the Parties’ deadline to submit their Initial Disclosures;

WHEREAS, for the sake of judicial economy and in an effort to use the Parties’ resources in an efficient manner, the Parties believe that continuing the Initial Scheduling Conference and extending the Parties’ deadline to submit their Initial Disclosures is appropriate; and

WHEREAS, the Parties therefore ask the Court to continue to the Initial Scheduling Conference and to extend the Parties’ deadline to submit their Initial Disclosures, by thirty (30) days.

1 GOOD CAUSE exists to continue to the Initial Scheduling Conference and to extend the
2 Parties' deadline to submit their Initial Disclosures because:

- 3 1) The Initial Scheduling Conference is currently scheduled for February 20, 2024;
- 4 2) The Parties' current deadline to submit their Initial Disclosures is February 8,
5 2024;
- 6 3) Plaintiff is considering whether to amend his Complaint;
- 7 4) The Parties need additional time to meet and confer, and review the documents
8 exchanged, which are relevant to Plaintiff's potential amended Complaint;
- 9 5) The Parties have agreed to ask the Court to continue to the Initial Scheduling
10 Conference and to extend the Parties' deadline to submit their Initial Disclosures
11 by thirty (30) days;
- 12 6) Neither Party will be prejudiced by continuing the Initial Scheduling Conference
13 or by extending the Parties' deadline to submit their Initial Disclosures; and
- 14 7) This is the second request by the Parties to continue the Initial Scheduling
15 Conference and to extend the Parties' deadline to submit their Initial Disclosures.

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1 IT IS THEREFORE STIPULATED and agreed, subject to the approval of this Court, that
2 the Initial Scheduling Conference should be continued by thirty (30) days to March 19, 2024, or
3 another date convenient for the Court, and that the Parties' deadline to submit their Initial
4 Disclosures should be extended by thirty (30) days until March 11, 2024.

5 **IT IS SO STIPULATED.**

6
7 Dated: February 9, 2024

GORDON REES SCULLY MANSUKHANI, LLP

8 By: /s/Ronald K. Alberts
9 Ronald K. Alberts
10 Hela Vaknin
11 Attorneys for Defendant
AETNA LIFE INSURANCE COMPANY

12 Dated: February 9, 2024

WILKINS, DROLSHAGEN & CZESHINSICI LLP

13
14 By: /s/James H. Wilkins
15 James H. Wilkins
16 Attorneys for Plaintiff
17 LAWRENCE BRANCO
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19 **CERTIFICATION PURSUANT TO LOCAL RULE 131(e)**

20 Pursuant to Local Rule 131(e), I hereby certify that the content of this document is
21 acceptable to James H. Wilkins, counsel for Plaintiff, and I have obtained his authorization to
22 affix his electronic signature to this document on February 9, 2024.

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24 By: /s/Ronald K. Alberts
Ronald K. Alberts

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ORDER

Having considered the above stipulation (ECF No. 10), IT IS ORDERED as follows:

1. The Initial Scheduling Conference currently scheduled for February 20, 2024, is continued to March 19, 2024, at 10:30 a.m. The parties are permitted to appear telephonically and may do so by dialing 1-888-251-2909 and entering access code 1024453. The parties are reminded to file a joint scheduling report at least seven days before the conference. (ECF No. 2, p. 2).
2. The Parties' deadline to submit their Initial Disclosures is extended by thirty (30) days to March 11, 2024.

IT IS SO ORDERED.

Dated: **February 9, 2024**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE